

1. On March 12, 2025, Plaintiff, Alan Goldman notified defendants Endurance American Specialty Insurance Company, Sompo International Insurance Company and AIG Insurance Company-Puerto Rico, through their respective attorneys, the First Set of Interrogatories and Request for Production of Documents.
2. Pursuant to Rule 33 of the Federal Rules of Civil Procedure, defendants have 30 days to answer in writing and under oath said interrogatories, that is due, on April 11, 2025.

**WHEREFORE**, Plaintiff, Alan Goldman respectfully requests from this Honorable Court to take notice of this motion, and to grant any remedy that this Court may deem to be just and proper.

RESPECTFULLY SUBMITTED.

In Miami, Florida, on the 12<sup>th</sup> day of March 2025.

CERTIFICATE OF SERVICE

**I HEREBY CERTIFY** that on this 12<sup>th</sup> day of March 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all the counsel of record.

*s/Francisco M. López-Romo*  
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